

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

STEPHEN ATES,

Debtor.

No. 21-41090

OBJECTION TO EXEMPTIONS

Kathryn A. Ellis, the Chapter 7 Trustee herein, hereby objects to the exemptions of the debtor as described below:

1. To the extent that the debtor is attempting to claim an exemption in excess of the value permitted by federal or state law, the Trustee objects to the assertion of such an exemption;

2. To the extent that the debtor is attempting to claim an exemption for property for which no exemption is permitted under federal or state law, the Trustee objects to the assertion of such an exemption, including but not limited to the debtor's claim of exemption in the real property located at 60 NE Lake Dr, Tahuya, WA pursuant to RCW 6.13.010, 6.13.020, and 6.13.030, in which the debtor admits there is no equity, and to the extent the debtor's claim of exemption attempts to prioritize the debtor's claim of exemption ahead of consensual liens, any lien in favor of the Internal Revenue Service, and any debts owed to the State of Washington as described in RCW 82.32.240, 6.13.080 (5) and/or (7);

3. To the extent that the debtor does not describe an asset or other item of property for which an exemption is claimed with particularity, the Trustee objects to the assertion of such an exemption;

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KATHRYN A. ELLIS PLLC
5506 6th Ave S
Suite 207
Seattle, WA 98108
(206) 682-5002

4. To the extent that the actual value of an asset exceeds the valuation of the asset by the debtor, the Trustee objects to the claim of any exemption; and

5. To the extent that the debtor has not provided information and/or documentation to the Trustee and/or have failed to cooperate with the Trustee regarding the investigation of his financial affairs and/or concealed any property, the Trustee objects to any claims of exemption by the debtor.

The Trustee is objecting, in part, to preserve her rights to object pending receipt of more information about the debtor's assets. The Trustee reserves the right to assert any other basis for her objection or otherwise amend this objection as she may determine to be appropriate at a later date.

DATED this 28th day of July, 2021.

By: /s/ Kathryn A. Ellis
Kathryn A. Ellis, Trustee

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